

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

LAFAYETTE HILL

Case No. Case: 2:21-mj-30357  
Assigned To : Unassigned  
Assign. Date : 7/20/2021  
USA V. HILL (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of a Firearm

This criminal complaint is based on these facts:

\*SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 20, 2021


City and state: Detroit, Michigan



*Complainant's signature*

Special Agent Michael Stassi, ATF

*Printed name and title*



*Judge's signature*

HON. KIMBERLY ALTMAN, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Senior Special Agent/Certified Fire Investigator Michael Stassi, being duly sworn, depose and state the following;

1. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews conducted with other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the details, or facts of which I am aware relating to this investigation.
2. I have been employed as a Special Agent (SA) with the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since 2005. I have received formal training from the ATF National Academy, the National Fire Academy, the National Center for Explosives Training and Research and the Federal Law Enforcement Training Center. I have participated in investigations related to Federal and State firearms, arson, explosive, murder and tobacco trafficking laws. These investigations have resulted in the arrest and conviction of

- criminal defendants on both State and Federal firearms, arson, explosive, murder and tobacco diversion charges.
3. In addition to my duties as a criminal investigator, I am also an ATF Certified Fire Investigator (CFI). As an ATF CFI, I am tasked with providing expert opinions as to the origin and cause of fires and explosions. I obtained the ATF CFI certification in 2016 following a two (2) year training program that centered on various fire science topics including, but not limited to: chemistry, fire dynamics, and building construction. The two (2) year ATF CFI certification program consisted of graduate level college courses, written exams, research papers, reading assignments, practical training exercises, and test burns of various materials.
  4. To date, I have participated in over three hundred and thirty nine (339) fire and post-blast scene examinations and have conducted and/or observed over one hundred and thirty (130) live fire training exercises, where training fires were ignited and fire growth and development was documented. Additionally, I have been certified as a fire investigator by the International Association of Arson Investigators (IAAI) since June 2016 and have received over six

hundred and forty (640) class hours of fire and explosive related training.

5. I am currently investigating Lafayette HILL (DOB: XX, XX, 1986) for Federal firearms violations, specifically a Violation of 18 U.S.C. §922(g)(1), felon in possession of a firearm.
6. On May 16, 2021, Detroit Police Department (DPD) officers, working in a partially marked scout car, were conducting routine patrol near the intersection of Jefferson Ave. and 10<sup>th</sup> St in Detroit, MI. While driving in the noted area, officers observed a male, later identified as Lafayette HILL, standing on the sidewalk. One of the officers observed a suspected handgun in his right pocket.
7. As officers approached HILL to conduct a further investigation, they identified themselves and made verbal confirmation that HILL did not have a valid Michigan Concealed Pistol License (CPL). A subsequent search of HILL's person revealed the presence of one (1) Smith and Wesson, M&P Shield, 9mm handgun, loaded with seven (7) rounds of 9mm ammunition and bearing serial number: HKE1836, in his right pant pocket. While being detained for the noted firearm, HILL voluntarily provided statements indicating that he knew the firearm

was on his person and that he had obtained the weapon from the adjacent yard.

8. On June 22, 2021, I reviewed a National Crime Information Center (NCIC) computer printout regarding HILLS's criminal history. The NCIC printout revealed the following felony convictions: a October 30, 2006, conviction for Felony Controlled Substance less than 50 grams and a November 2, 2006, conviction for Attempt Felony Carrying a Concealed Weapon.
9. On this same date, I consulted with ATF Special Agent Joshua McLean, a certified firearms Interstate Nexus expert, concerning the manufacture of the above-mentioned Smith and Wesson, M&P Shield 9mm. Special Agent McLean stated that the firearm was manufactured outside the State of Michigan. Therefore the firearm traveled in and affected interstate and/or foreign commerce.